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Attorneys for Plaintiff and Counterclaim-  
Defendant LYMI Inc.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

LYMI Inc.,

Plaintiff,

v.

Few Moda, Inc.,

Defendant.

Case No. 2:24-cv-4564-GW-RAO

**Joint Stipulation to Modify  
Scheduling Order**

Judge: Hon. George H. Wu

Few Moda, Inc.,

Counterclaimant,

v.

LYMI Inc.,

Counterclaim-Defendant.

Pursuant to Fed. R. Civ. P. 16(b)(4) and the Court's December 18, 2024  
Scheduling Order (Dkt. No. 21), the Parties jointly stipulate and agree that the Court  
enter an order modifying the Scheduling Order to continue certain dates, as follows:

1           1.     In the operative Scheduling Order, the Court set certain deadlines for  
2 trial, discovery, and related motions. Dkt. No. 21.

3           2.     The Parties previously stipulated to modify the Scheduling Order to  
4 allow Defendant and Counterclaimant Few Moda, Inc. (“Few Moda”) to file a  
5 corrected Amended Answer and Counterclaim, which the Court granted. Dkt. Nos.  
6 35–37.

7           3.     Since the Court entered the Scheduling Order and discovery opened in  
8 this matter, the Parties have exchanged discovery requests. In particular, Plaintiff  
9 and Counterclaim-Defendant LYMI Inc. (“Reformation”) served interrogatories and  
10 requests for production on January 17, 2025; Few Moda timely served written  
11 responses on February 18, 2025, which included materials concerning Few Moda’s  
12 sales of the allegedly infringing items; and the Parties have met and conferred  
13 regarding Few Moda’s responses and document production. Few Moda served  
14 interrogatories and requests for production on March 4, 2025.

15          4.     The Parties have previously discussed settlement prior to the opening of  
16 the discovery in this case. The Parties have agreed to mediate at this juncture and are  
17 in the process of selecting a mediator and the date and location for mediation. The  
18 Parties anticipate engaging in mediation by the Court’s existing June 9, 2025  
19 deadline.

20          5.     Under the current case schedule, the current close of fact discovery is  
21 June 20, 2025, and the current close of expert discovery is July 18, 2025. The  
22 Court’s order directed the Parties to meet and agree on the dates for exchange of  
23 initial and rebuttal expert reports. The Parties have met and conferred on these dates  
24 and assessed that the existing deadlines create difficulties with dates for the expert  
25 reports relative to the Parties’ plans for mediation, the close of fact discovery, and  
26 the close of expert discovery.

27          6.     The Parties agree that good cause exists for a 60-day continuance of  
28 certain dates in the Court’s Scheduling Order because such a continuance will

1 enable the Parties to timely complete discovery, conduct expert work and exchange  
2 expert reports, engage in mediation, and pursue meaningful settlement discussions.

3 7. Aside from the Parties' previous stipulation to allow Few Moda's  
4 corrected re-filing of its Amended Answer and Counterclaim, the Parties have not  
5 previously requested any modification of trial and pretrial dates in this case.

6 8. Accordingly, the Parties respectfully jointly stipulate and request that  
7 the Court modify certain dates in the Scheduling Order as follows:

9 Event	Current Date	Proposed Date
10 Regular discovery completed	June 20, 2025	August 19, 2025
11 Expert discovery completed	July 18, 2025	September 16, 2025
12 Last day Court to hear motions 13 other than motions in limine	August 18, 2025	October 20, 2025
14 Pre-trial conference	September 18, 2025	November 20, 2025
15	8:30am	8:30am
16 Trial	September 30, 2025	December 2, 2025

17  
18 All other dates in the Court's December 18, 2024 Scheduling Order to remain  
19 in effect as originally set.

20  
21 DATED: March 14, 2025

HANSON BRIDGETT LLP

22  
23  
24 By: /s/ Justin Thiele

25 RAFFI V. ZEROUNIAN

GARNER K. WENG

26 JUSTIN P. THIELE

27 Attorneys for Plaintiff and Counterclaim-  
28 Defendant LYMI Inc.

1 DATED: March 14, 2024

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18 *Counterclaimant*

**Multiple Signature Attestation**

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the content of this stipulation and have authorized the filing of this stipulation.

DATED: March 14, 2025

HANSON BRIDGETT LLP

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